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September 8, 2016

Clerk
United States District Court
for the District of Maryland
Northern Division
Garmatz Federal Building
101 West Lombard Street
Baltimore, Maryland 21201

Re: Broadcast Music, Inc., et al
vs. Second Chance Operating Ventures, LLC, etc., et al

Dear Madam Clerk:

Please accept the following as Plaintiff Broadcast Music, Inc.'s ("BMI") Local Rule 103.3 statement:

In addition to the attached Fed.R.Civ.P. 7.1 Schedule, please be advised as follows: BMI operates as a non-profit-making corporation which collects and receives royalties for the public performance of music whose copyrights are owned by its affiliated songwriters, composers, and music publishers (the "Affiliates"). The net proceeds, which total over 85% of the royalties collected, are distributed to BMI's Affiliates. Hence, to the extent that this case may involve challenges to BMI's rights to receive certain royalties and BMI's ability to collect damages and obtain an injunction, it may be alleged that such Affiliates have an indirect financial interest in the outcome of this case. BMI's Affiliates number over 300,000, some of which may be either publicly owned corporations themselves or affiliates or subsidiaries of publicly owned corporations. It is not practical for BMI to determine who such publicly owned corporations may be. It is believed, however, that the financial stake of any directly or indirectly publicly owned corporate Affiliate of BMI in the outcome of this case would not be material to such Affiliate, because any recovery in this litigation inures to the benefit of all of BMI's Affiliates. In this regard, however, please see the attached Rule 7.1 Schedule.

Very truly yours,

/s/ Max S. Stadfeld

MSS:kam

Enclosure

00150095.00055/4848-1825-6952, v. 1

Fed.R.Civ.P. 7.1 Schedule

Plaintiff

Parent Corporation or any publicly held corporation
owning 10% or more of its stock

Broadcast Music, Inc. ("BMI")

BMI certifies that Gannett Co., Inc., which is publicly held, owns indirectly through a wholly-owned subsidiary more than 10% of BMI's stock. BMI has no publicly held parent companies, affiliates or subsidiaries, and there are no other publicly held companies that own 10% or more of BMI's stock.

Sony/ATV Songs LLC

Sony Music Entertainment, Inc.

Stone Diamond Music Corp.

EMI Group Global Ltd.

Unichappell Music Inc.

Warner Music Group Corp.